

1 Christopher Peterson
2 Nevada Bar No.: 13932
3 Jacob T.S. Valentine
4 Nevada Bar No.:16324
AMERICAN CIVIL LIBERTIES
UNION OF NEVADA
5 4362 W. Cheyenne Ave.
North Las Vegas, Nevada 89032
6 Telephone: (702) 366-1226
Facsimile: (702) 830-9205
7 Email: peterson@aclunv.org
Attorneys for Plaintiff

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT COURT OF NEVADA**
12

AMERICAN CIVIL LIBERTIES UNION OF
NEVADA, a domestic nonprofit organization,
CORIE HUMPHREY, an individual;

13 Plaintiffs,
14
15 vs.
16

17 CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada,
18
19 Defendant.

Case Number: 2:25-cv-00892

STIPULATION AND [PROPOSED]
ORDER FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION

20 It is stipulated by and between the undersigned parties, through their attorneys, that:

- 21 1. Stoles (not to exceed 5) and flat decorations and adornments on caps and gowns will be
22 permitted to be worn by Clark County School District graduates at their graduations.
- 23 2. Decorations and adornments must not be lewd, obscene, vulgar, profane, promote violence,
24 promote the use of illicit drugs, constitute harassment, bullying, or discrimination.
- 25 3. If a decoration or adornment is substantially disruptive or creates a material interference as
26 described above, the graduate will be advised to remove the decoration or adornment to
27 attend the ceremony.
- 28

1 4. Besides stoles and flat decorations and adornments discussed above, Defendant Clark
2 County School District may still prohibit other graduation regalia items that substantially
3 disrupt or materially interfere with the graduation ceremony consistent with the First
4 Amendment and NRS 388.915.

5 5. Defendant Clark County School District will send the following information to Clark
6 County School District students upon the filing of the instant order:

8 “Stoles (not to exceed 5) and flat decorations and adornments on caps
9 and gowns will be permitted to be worn by graduates at their
10 graduations. Decorations and adornments must not be lewd, obscene,
11 vulgar, profane, promote violence, promote the use of illicit drugs,
12 constitute harassment, bullying, or discrimination. If a decoration or
13 adornment is substantially disruptive or creates a material
14 interference as described above, the graduate will be advised to
15 remove the decoration or adornment to attend the ceremony. Besides
16 stoles and flat decorations and adornments discussed above, CCSD
17 may still prohibit other graduation regalia that substantially disrupts
18 or materially interferes with the graduation ceremony consistent with
19 the First Amendment and NRS 388.915.”

20 6. Defendant Clark County School District will send the following information to Clark
21 County School District school administrators upon the filing of the instant order:

23 “Stoles (not to exceed 5) and flat decorations and adornments on caps
24 and gowns will be permitted to be worn by graduates at their
25 graduations. Decorations and adornments must not be lewd, obscene,
26 vulgar, profane, promote violence, promote the use of illicit drugs,
27 constitute harassment, bullying, or discrimination. If a decoration or
28 adornment is substantially disruptive or creates a material

interference as described above, the graduate will be advised to remove the decoration or adornment to attend the ceremony. Besides stoles and flat decorations and adornments discussed above, CCSD may still prohibit other graduation regalia that substantially disrupts or materially interferes with the graduation ceremony consistent with the First Amendment and NRS 388.915.”

DATED 26th day of May 2025.

AMERICAN CIVIL LIBERTIES UNION OF NEVADA

By: /s/ Christopher M. Peterson
Christopher M. Peterson
Jacob T.S. Valentine
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
peterson@aclunv.org
jvalentine@aclunv.org
Attorneys for Plaintiffs

**WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC**

By: /s/ Jacqueline V. Nichols
Jacqueline V. Nichols, Esq.
Phillip N. Smith Jr., Esq.
6385 South Rainbow Blvd., Suite 400
Las Vegas, NV 89118
*Attorneys for Defendant Clark County
School District*

ORDER

The above stipulation is granted.

IT IS SO ORDERED

UNITED STATES DISTRICT JUDGE

DATE: 5/25/25

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of May, 2025, I electronically filed a true and correct copy of the forgoing STIPULATION AND [PROPOSED] ORDER FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished on all participants by:

- CM/ECF
- Electronic mail; or
- US Mail or Carrier Service

/s/Christopher Peterson
An employee of the ACLU of Nevada